REMARKS

Summary of Amendments

1. Claims 1-6 were originally presented in this application. By the present amendment, claims 2 and 4 have been canceled. Claims 1 and 5 have been amended, as described in more detail below, to more particularly point out and distinctly claim the subject matter of the instant invention, while claim 3 has been amended for editorial clarity (as additionally have claims 1 and 5). Claims 1, 3, 5, and 6 thus remain pending.

Claim Rejections – 35 U.S.C. § 102

2. Claims 1-6 were rejected under 35 U.S.C. § 102(e) as being anticipated by *Goodman* (U.S. Pat. No. 6,634,882). The Examiner states:

> Goodman discloses a wafer holder comprising a top surface having a plurality of protrusions or nubs (220) having a surface area of 70 mm^2 or less (column 6, lines 17-26) and [which] are inherently 40% or less than the surface area of the wafer, which can easily be seen in Figs. 1A-8.

3. Applicants respectfully traverse this rejection to the extent that it is pertinent to independent claims 1 and 5 as amended. Claim 1 has been amended to include the limitation of claim 2 and is thus supported by original claims 1 and 2. Claims 1 and 5 have been further amended to recite that the wafer-carrying face [has] a planarity of 0.5 mm or less. This amendment is supported, for example, by Paragraph [0057] of the original specification, such that no new matter has been added and no new search should be required.

4. Applicants respectfully submit that independent claims 1 and 5 now distinguish patentably over *Goodman*. Claims 1 and 5, as amended, recite a structure in which the entire wafer-carrying surface has a planarity of 0.5 mm or less. MPEP § 2131 states that a reference must teach every element of a claim in order to properly anticipate that claim. Applicants respectfully submit that *Goodman* does not disclose a planar wafer-carrying surface. On the contrary, *Goodman* discloses a concave wafer-carrying surface (see Fig 5). The concavity disclosed by *Goodman* is intentionally imparted to create a "flow volume" between the underside of the wafer and the wafer-carrying face of the holder (column 7, lines 18-29, and line 54 of the same column through line 18 of column 8). Accordingly, *Goodman* cannot anticipate amended claims 1 and 5.

5. Moreover, Applicants further submit that the structure recited in claims 1 and 5 is important to the isothermal performance of the wafer holder. In particular, reducing the surface area of the flat portions of the nubs to 70 mm^2 or less while at the same time imparting a planarity of 0.5 mm or less to the wafer-carrying surface makes it possible to achieve a uniform temperature distribution across the entire wafer-carrying surface (within ±1%). This is in contrast to the disclosure of *Goodman*, which teaches that the "flow volume" has no "adverse effect on the thermal interaction between the wafer and the susceptor" (column 9, lines 1-10). *Goodman* goes on to teach that concave wafer surfaces provide for "improved deposition uniformity and repeatability." This is in direct contrast to, and teaches away from, the language of independent claims 1 and 5. Accordingly, Applicants further submit that claims 1 and 5 are non-obvious over *Goodman* (viewed alone or in combination with any other reference).

6. Applicants respectfully submit that independent claims 1 and 5 are allowable over the prior art of record for the reasons set forth above. Independent claims 1 and 5 being allowable, it follows that dependent claims 3 and 6 must also be allowable. Applicants therefore submit that pending claims 1, 3, 5, and 6 are allowable over the prior art of record.

Accordingly, Applicants courteously urge that this application is in condition for allowance. Reconsideration and withdrawal of the rejections is requested. Favorable action by the Examiner at an early date is solicited.

Respectfully submitted,

May 4, 2007

/James Judge/

James W. Judge
Registration No. 42,701

JUDGE & MURAKAMI IP ASSOCIATES
Dojima Building, 7th Floor
6-8 Nishitemma 2-Chome, Kita-ku
Osaka-shi 530-0047
JAPAN

Telephone: **305-938-7119**
Voicemail/Fax: **703-997-4565**